

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DIRECT REPORT CORPORATION
d/b/a/ SHAREHOLDER.COM,

Plaintiff,

v.

CCBN.COM, INC., THE THOMSON
CORPORATION, JOHN DOES 1 THROUGH
5, and JANE DOES 1 THROUGH 5,

Defendants.

Civil Action No. 04-10535-PBS

JOINT MOTION TO EXTEND DISCOVERY DEADLINE

Plaintiff Direct Report Corporation d/b/a/ Shareholder.com ("Shareholder") and defendants CCBN.com, Inc. ("CCBN") and The Thomson Corporation ("Thomson") respectfully submit this Joint Motion to Extend Discovery Deadline in the above-captioned matter. The parties request that the current fact discovery deadline be extended from February 1, 2005, to April 1, 2005, and that all subsequent deadlines in the Scheduling Order be extended by 60 days. In support of this joint motion, the parties state as follows:

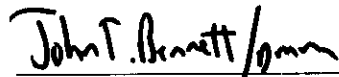
- (1) under the current Scheduling Order entered by the Court, fact discovery in this matter is scheduled to close by February 1, 2005;
- (2) although the parties have been actively engaged in discovery over the past several months, due to scheduling difficulties among the parties and certain non-party witnesses, the parties will be unable to complete necessary fact discovery within the time currently scheduled;
- (3) although the parties have a dispute over the pace of document and witness production, they would prefer to work cooperatively to ensure sufficient time is allowed for the completion of fact discovery;

(4) in addition, the parties have disputes regarding the appropriate scope of discovery and certain privilege issues, as well as motions regarding the same, that are outstanding.

Accordingly, the parties respectfully request that the fact discovery deadline in this matter be extended from February 1, 2005 to April 1, 2005, and that all subsequent scheduling order deadlines be extended by 60 days, as set forth in the accompanying proposed order.

Respectfully submitted,

PALMER & DODGE LLP

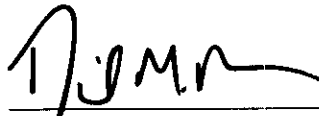


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